

EXHIBIT D

Waleed Nassar

From: Waleed Nassar
Sent: Wednesday, April 06, 2016 10:35 AM
To: 'Haefele, Robert'
Subject: RE: 9/11 Litigation - Proposed Date for Mutual Exchange of Information

Understood Robert. If the proposed April 19 date does not work for you, please let us know by April 15 what date in April does work for you to conduct the exchange.

From: Haefele, Robert [<mailto:rhaefele@motleyrice.com>]
Sent: Wednesday, April 06, 2016 7:36 AM
To: Waleed Nassar
Subject: Re: 9/11 Litigation - Proposed Date for Mutual Exchange of Information

Waleed - As I indicated at the outset of this discussion, I have been traveling and engaged in some other obligations. I still need to speak to some others before I can respond to you. I will try to let you know our position when I am back in my office next week.

Sent from my iPhone

On Apr 4, 2016, at 12:51 PM, Waleed Nassar <Waleed.Nassar@lewisbaach.com> wrote:

Robert,

I am writing to follow-up on our attempt below to set a date for our mutual exchange of information, as per the Court's March 22nd order. We have not received a response regarding our proposed date of [April 19, 2016](#). Please let us know if that date is agreeable. If not, please explain why not and propose an alternative date for us to consider.

Best,
Waleed

From: Waleed Nassar
Sent: Monday, March 28, 2016 3:51 PM
To: Haefele, Robert
Subject: Re:

Robert,

We have been litigating this issue for many months. Judge Maas indicated he wanted this to move forward and that the detailed explanation be provided within two weeks. Asking for nearly three months is not reasonable. We want to be reasonable and so are amenable to granting an additional two weeks for you to provide your submission re: safety concerns to the originating source. This is twice the time originally contemplated.

We should also find a date to exchange the various information per Judge Maas' order and we would suggest that it be the same date. Four weeks from the date of the hearing is [April 19, 2016](#). This includes (1) the name of the investigative source, and (2) the date on which you obtained the documents. Both of those pieces of information are presumably in your possession. At that time we will provide to you our detailed description of the flaws in the documents including affidavit evidence from our expert and our client.

Best,
Waleed

Sent from my iPhone

On Mar 25, 2016, at 12:25 PM, Haeefe, Robert <rhaefe@motleyrice.com> wrote:

Waleed – It has come to my attention that Judge Maas indicated that he anticipated Plaintiffs to submit their “particularized showing” in a fairly short time period. For a variety of reasons (some related to the task and others related to my other competing commitments), we are asking to move any deadline he may impose concerning the particularized showing to June 15. Can you indicate your clients’ agreement to this proposal, please?

Robert T. Haeefe | Attorney at Law | Motley Rice LLC
28 Bridgeside Blvd. | Mt. Pleasant, SC 29464 | rhaefe@motleyrice.com
o. 843.216.9184 | c. 843.834.1951 | f. 843.216.9450

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